



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 10 2015

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6125 8782

Ms. Phyllis MacConnel
Special Projects
Trinity Products Inc.
1969 West Terra Lane
O'Fallon, Missouri 63366

RE: Trinity Products
O'Fallon, Missouri
RCRA ID No: MOR000521245

Dear Ms. MacConnel:

Request for Information

The U. S. Environmental Protection Agency (EPA) is seeking additional information about the management of hazardous waste at your facility. Section 3007 of the Resource Conservation and Recovery Act (RCRA) gives EPA the authority to obtain this information in order to determine your facility's compliance with the hazardous waste regulations.

The enclosure contains instructions, followed by the requested information. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required, and substantial penalties may result from not complying. Please note that EPA retains its authority to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the review of your response to this letter, regardless of whether the violations were subsequently corrected.



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Within thirty (30) calendar days of receiving this letter, please mail your response to: Berla Y. Johnson, AWMD/WEMM, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions to Berla Y. Johnson at (913) 551-7720.

Sincerely,



Donald Toensing

Chief

Waste Enforcement and Materials Management

Branch

Air and Waste Management Division

Enclosures

cc: Ms. Nicole Eby, Missouri Department of Natural Resources
Missouri Department of Natural Resources Regional Office

List of Requested Information
Trinity Products
O'Fallon, Missouri 63366
RCRA ID No.: MOR000521245

1. Provide detailed information documenting how staff collected representative samples for analyses of the Spent Grit Blast Residue, Paint/Blast PPE, and Floor Sweepings, following the February 10 – 11, 2015 inspection at the Trinity Products facility.
2. Submit all waste determination results that were received by Trinity Products from the St. Louis Testing Laboratories and any other laboratory where samples were sent following the February 10 – 11, 2015 inspection for the Spent Grit Blast Residue, Paint/Blast PPE, and the Floor Sweepings.
3. If any of the spent grit blast residue, paint/blast PPE, and floor sweepings were determined to be hazardous, provide detailed information of how you will be handling and disposing of those materials.
4. Provide photographic documentation that Trinity Products closed, labeled, and dated satellite accumulation containers of hazardous paint waste in non-empty containers.

3007 RESPONSE INSTRUCTIONS

- * Identify the Person(s) responding to this request on your behalf.
- * Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- * For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- * For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- * For each numbered item, identify all persons consulted in the preparation of the answer.
- * For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- * If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- * If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- * If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- * You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- * The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- * A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- * Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.
- * This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- * The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.